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December 10, 2014

Hon. Marilyn D. Go,  
United States Magistrate Judge  
United State District Court  
Eastern District of New York  
225 Cadman Plaza East, Room 1214-S  
Brooklyn, NY 11201

Re: BABCOCK, et al v. C.TECH COLLECTIONS, INC., et al  
14-CV-3124

Dear Judge Go:

Please be advised that this office represents the corporate and individual defendants in this matter. This letter is written in response to the correspondence from Andrew Thomasson, dated December 5, 2014.

It is important to note that all requests for admissions have been answered (there were four separate requests for admissions containing a total of 137 requests). C.Tech has responded to interrogatories and document requests and has produced a vast amount of documents which were difficult to compile with the limited staff employed at C.Tech's offices. In fact, complying with the document demands and interrogatory responses took much longer than anticipated, despite the efforts of the personnel assigned to that task by C.Tech.

Plaintiffs now have documents and interrogatory responses showing class size, net worth, identification of all potential class members along with calculations and spreadsheets regarding potential actual damages in this case using the different time periods referenced in plaintiffs' discovery demands.

Mr. Thomasson refers to his October 28, 2014 email and claims that the undersigned did not respond to it, but I have had conversations with him and his co-counsel in this case and have repeatedly indicated my desire and my client's desire to enter into meaningful settlement negotiations. I will be attending the scheduled settlement conference with the Court on December 22, 2014, and a representative of C.Tech will be present as well.

Hon. Marilyn D. Go

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December 10, 2014

Re: Babcock et al v C.Tech et al

It is wrong to characterize defendants' good faith efforts to comply with plaintiffs' thorough and voluminous demands as "unfair and deceptive discovery tactics."

The only conceivable missing piece of information necessary for a settlement conference to take place would be the net worth information for each individual defendant. While defendants do not concede that they should be named in this matter, they can produce net worth information within the next few days. They will need until December 19<sup>th</sup> to respond to any remaining demands.

Thank you for your consideration.

Sincerely yours,



ARTHUR SANDERS  
as/cw